

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

CHRISTIANA SUNSHINE LONGWAY, and :
 BUENAVENTURA RIVERA

Plaintiffs,

V.

THE SOCIETY FOR CREATIVE
ANACHRONISM, INC., a/k/a/ "SCA"
or "SCA, Inc.",
Defendant

1. *Chlorophyll a* (mg g⁻¹)
 2. *Chlorophyll b* (mg g⁻¹)
 3. *Chlorophyll a + b* (mg g⁻¹)
 4. *Carotenoids* (mg g⁻¹)
 5. *Chlorophyll a* (mg g⁻¹)
 6. *Chlorophyll b* (mg g⁻¹)
 7. *Chlorophyll a + b* (mg g⁻¹)
 8. *Carotenoids* (mg g⁻¹)
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 11. *Chlorophyll a + b* (mg g⁻¹)
 12. *Carotenoids* (mg g⁻¹)
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 14. *Chlorophyll b* (mg g⁻¹)
 15. *Chlorophyll a + b* (mg g⁻¹)
 16. *Carotenoids* (mg g⁻¹)
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 96. *Carotenoids* (mg g⁻¹)
 97. *Chlorophyll a* (mg g⁻¹)
 98. *Chlorophyll b* (mg g⁻¹)
 99. *Chlorophyll a + b* (mg g⁻¹)
 100. *Carotenoids* (mg g⁻¹)

No.: 7:21 CV 03142

MOTION FOR THE ISSUANCE OF A SUBPOENA DUCES TECUM

Plaintiffs Christiana Sunshine-Longway and Buenaventura Rivera request this Court, on a date and time to be selected by this Court, for an order pursuant to FRCP 34(c) and 45(a)(3), directing the issuance of a court ordered subpoena, attached as Exhibit 1, to the Westchester Department of Child Protective Services for the production to the Court of its unredacted records of all documents related to Case ID: 26981085, Stage ID: 31917213, for Jenna Sunshine-Longway, Cameron Sunshine-Longway, and Christiana Sunshine-Longway.

Plaintiffs further request that the Court issue a request, pursuant to N.Y. Soc. Serv. Law § 422, to the reporter identified in the CPS records, asking if they consent to the disclosure of their identity as the reporter to the parties in this case. As grounds therefore, the Plaintiffs rely on N.Y. Soc. Serv. Law § 422(4)(e), which allows for the disclosure of CPS records to a Court if the upon a finding that the information in the record is necessary for the determination of an issue before the court. N.Y. Soc. Serv. Law § 422(4)(e); Selapack v. Iroquois Central School District, 17 A.D.3d 1169, 1170 (N.Y. App. Div. 2005). Further, § 422 allows for the disclosure of the reporter's name with the reporter's written permission. N.Y. Soc. Serv. Law § 422(4)(a).

Here, the issue of the whether the reporter was associated with members of

Defendant Society for Creative Anachronism is an issue before the Court. Also before the Court are the issues of what abuse and maltreatment was reported to CPS, the steps CPS took to investigate the alleged abuse and maltreatment, the corrective actions required of Plaintiff Sunshine- Longway by CPS, and the ultimate findings of CPS as to the alleged abuse and maltreatment.

Plaintiffs further rely on the attached affidavit.

WHEREFORE, Plaintiffs respectfully request that the Court issue the attached subpoena and request the written permission of the reporter to disclose their identity to the parties in this case.

CHRISTIANA SUNSHINE-LONGWAY and
BUENAVENTURA RIVERA,
By their attorney,

/s/ Jason Tauches

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Dated: March 24, 2022

Certificate of Service

I, Jason E. Tauches, attorney for Plaintiffs Buenaventura Rivera and Christiana Sunshine Longway, hereby certify that on this 24th day of March 2022, I electronically served the foregoing document to counsel of record for Defendant the Society for Creative Anachronism through CM/ECF.

/s/ Jason E. Tauches

Jason E. Tauches